

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL - 1 2015

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY McDONALD,

and

DEON ELAM,

Defendants.

Cause Number:

4:15CR00310 AGF/TCM

INDICTMENT

COUNT ONE

The Grand Jury charges that:

Between October, 2011 and May, 2015, in the Eastern District of Missouri and elsewhere,
including the Central District of California, the defendants,

**ANTHONY McDONALD,
and
DEON ELAM,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and
other persons known and unknown to this Grand Jury, to commit offenses against the United
States, to wit: to distribute and possess with the intent to distribute a mixture or substance
containing a detectable amount of cocaine, a Schedule II Controlled Substance drug, in violation
of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846; and

Quantity of Cocaine Involved in the Conspiracy

With respect to both defendants, the amount of cocaine involved in the conspiracy attributable to each defendant as a result of their own conduct, and the conduct of other conspirators reasonable foreseeable to them, is five (5) kilograms or more, punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

JOHN T DAVIS, #40915MO
Assistant United States Attorney